

OFFICIAL FILE

BEFORE THE ILLINOIS COMMERCE COMMISSION

No. 00-066

App

Exhibit No. 1

SCC Communications Corp.

Witness _____

Date 10/19/00 Reporter _____

Docket No. _____

Application for a Certificate of
Authority to Provide Telecommunications
Services in the State of Illinois

DIRECT TESTIMONY AND EXHIBITS OF

GARY A. KLUG

September 14, 2000

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 **A.** My name is Gary A. Klug. My business address is 6285 Lookout Road, Boulder,
3 Colorado 80301-3343.

4 **Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR PRESENT**
5 **POSITION?**

6 **A.** I am employed the SCC Communications Corp. ("SCC") as the Director of
7 Regulatory Compliance. A statement of my qualifications is attached as Appendix
8 A.

9 **Q. HAVE YOU EXAMINED THE APPLICATION AND CORRESPONDING**
10 **MATERIALS FILED BY SCC IN THIS PROCEEDING?**

11 **A.** Yes, I have.

12 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

13 **A.** The purpose of my testimony is to:

- 14 • Provide a brief description of SCC;
- 15 • Describe the purpose of SCC's Application;
- 16 • Describe SCC's managerial and technical qualifications to provide the services
- 17 described in SCC's Application; and
- 18 • Describe why granting SCC's Application serves the public interest.

19 **Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF SCC.**

20 **A.** SCC is a publicly held corporation incorporated in the State of Delaware. The
21 original Certificate of Incorporation was filed with the Secretary of State of
22 Delaware on September 17, 1993. SCC was granted authority to transact business

1 in Illinois on June 3, 1994, and SCC is a foreign corporation in good standing and
2 authorized to transact business in the State of Illinois.

3 SCC is the leading provider of 9-1-1 data management services to incumbent
4 local exchange carriers, competitive local exchange carriers ("CLECs"),
5 integrated communications providers, and wireless carriers in the United States.
6 SCC currently manages the records for approximately 93.5 million wireline
7 telephone subscribers, including 4.1 million CLEC subscribers, and more than 1.6
8 million wireless subscribers. SCC currently manages the Master Street Address
9 Guides ("MSAGs") for 28 states, processes more than 140,000 service orders per
10 day, and processes in excess of 50,000 MSAG requests a year. In addition, SCC
11 has been selected by the Texas Commission on State Emergency Communication
12 as the state's designated 9-1-1 management services provider.

13 SCC's maintains a network of 22 fault-tolerant, geographically diverse Automatic
14 Location Information ("ALI") nodes. SCC also maintains a mated pair of
15 geographically separate Service Control Points that are used to provide 9-1-1
16 selective routing based on Advanced Intelligent Network technology and
17 Signaling System 7.

18 **Q. PLEASE DESCRIBE SCC's MANAGERIAL AND TECHNICAL**
19 **QUALIFICATIONS TO PROVIDE THE SERVICES DESCRIBED IN**
20 **SCC's APPLICATION.**

21 **A.** SCC currently employs approximately ⁴⁶⁰~~382~~ highly-qualified individuals that
22 represent some of the sharpest and most proactive minds in the
23 telecommunications industry. Gathered from the public safety, software

1 development, and telecommunications industries, SCC's team of professionals is
2 at the forefront of industry debate and is uniquely qualified to formulate creative,
3 reliable public safety communications solutions. Exhibit C to SCC's Application
4 details the managerial and technical expertise of SCC's key personnel. As
5 Exhibit C illustrates, SCC possesses the managerial and technical qualifications
6 and expertise to provide the services described in SCC's Application.

7 **Q. PLEASE BRIEFLY DESCRIBE PURPOSE OF SCC'S APPLICATION.**

8 **A.** SCC seeks certification so that it may aggregate and transport emergency calls in
9 the State of Illinois. SCC 9-1-1 SafetyNetSM services are telecommunications
10 services that permit a Public Safety Answering Point ("PSAP") designated by the
11 authorized 9-1-1 administrative entity to receive emergency calls placed by
12 dialing the number 9-1-1, emergency calls originated by personal safety devices
13 terminating at a designated service bureau and requiring public safety assistance,
14 and emergency calls from non-traditional sources such as personal data assistants,
15 wireless communications devices, and the Internet. The services include the use
16 of an enhanced coordinate routing call management system and may include the
17 facilities required to transport and deliver the calls to the appropriate 9-1-1
18 selective routing tandem for delivery to the PSAP.

19 SCC does not provide long distance toll services or local exchange dial tone
20 services, does not intend to provide such services, and does not seek authority to
21 provide such services. However, in order to aggregate and transport emergency
22 calls, SCC will require the same sort of interconnection and collocation afforded
23 to certified CLECs. SCC respectfully requests, therefore, that the Commission

1 find that SCC is entitled to the rights of interconnection, collocation, and access to
2 unbundled network elements enjoyed by CLECs under the Telecommunications
3 Act of 1996.

4 **Q. PLEASE EXPLAIN WHY GRANTING SCC'S APPLICATION IS IN THE**
5 **PUBLIC INTEREST.**

6 **A.** For more than thirty years, the existing 9-1-1 infrastructure has performed
7 admirably. However, the introduction and proliferation of portable communications
8 technologies such as wireless telephones, Internet Protocol telephony, personal data
9 assistants, telematics devices in automobiles, and other portable devices places
10 burdens on the existing 9-1-1 infrastructure that severely strain its capability to
11 deliver emergency calls to the appropriate PSAP.

12 SCC's 9-1-1- SafetyNet services are designed to accommodate traditional and non-
13 traditional emergency calls that originate from a plethora of platforms, access
14 networks, and service providers. 9-1-1 SafetyNet augments the existing 9-1-1
15 infrastructure to enhance 9-1-1 service for Illinois consumers and to enable Illinois'
16 9-1-1 infrastructure to adapt to and accommodate next-generation communications
17 devices and technologies. 9-1-1 SafetyNet is a solution that will benefit
18 telecommunications providers, the public safety community, and consumers who
19 rely on 9-1-1.

20 In addition, by granting this application, the Commission will build upon its well-
21 established policy of promoting competition in the telecommunications marketplace.

22 The Commission has long recognized that increased competition in the
23 telecommunications marketplace will further the public interest by increasing

1 efficiency, stimulating technological innovation, and increasing the range, variety,
2 and utility of services offered to users. SCC plans to contribute to this competitive
3 marketplace in Illinois by providing its 9-1-1 SafetyNet service.

4 Based on the foregoing, I respectfully request that the Commission approve
5 SCC's Application as serving the public interest.

6 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

7 **A. Yes.**

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SCC Communications Corp.

Application for a Certificate of
Authority to Provide Telecommunications
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Docket No. _____

AFFIDAVIT OF GARY A. KLUG

STATE OF COLORADO)
)ss
BOULDER COUNTY)

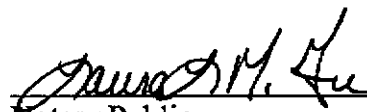
I, Gary A. Klug, being duly sworn, depose and state:

1. I am the Director – Regulatory Compliance of SCC Communications Corp. ("SCC").
2. I am familiar with SCC's Application for a Certificate of Authority to Provide Telecommunications Services in the State of Illinois, and corresponding attachments and exhibits.
3. Being duly sworn, I state that the attached direct testimony, attachments, and exhibits were prepared by me or under my supervision, control, and direction; that the direct testimony, attachments, and exhibits are true and correct to the best of my information, knowledge, and belief; and that I would give the same testimony orally and would present the same attachments and exhibits if asked under oath.



Gary A. Klug
Director – Regulatory Compliance

Subscribed and sworn before me this 13th day of September 2000 in the State and County above named.



Notary Public

